Exhibit E

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STEVEN GREER,

Plaintiff,

- against -

DENNIS MEHIEL, ROBERT SERPICO, THE BATTERY PARK CITY AUTHORITY, HOWARD MILSTEIN, STEVEN ROSSI, JANET MARTIN, MILFORD MANAGEMENT, and MARINERS COVE SITE B ASSOCIATES,

Defendants.

No. 15-CV-06119 (AJN) (JLC)

THE BPCA DEFENDANTS' SECOND REQUEST FOR THE PRODUCTION OF DOCUMENTS TO PLAINTIFF

PLEASE TAKE NOTICE that, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendants the Hugh L. Carey Battery Park City Authority ("BPCA") and Robert Serpico (the "BPCA Defendants"), by their undersigned attorneys, hereby demand that Plaintiff Steven Greer produce the following documents and things identified and listed below for inspection, copying and examination at the offices of Sher Tremonte LLP, located at 90 Broad Street, 23rd Floor, New York, NY 10004, on or before May 15, 2017.

DEFINITIONS AND INSTRUCTIONS

A. The definitions provided in Fed. R. Civ. P. Rule 34(a) and Rule 26.3 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York are incorporated by reference.

B. Any reference to a party shall include such party's agents, employees and attorneys.

C. If you claim any form of privilege as a ground for withholding any document, set forth in complete detail each and every fact upon which the privilege is based, including (a) the nature of the privilege; (b) the type of document, *e.g.*, letter or memorandum; (c) the general subject matter of the document; (d) the date of the document; (e) the author of the document; (f) the addressee(s) of the document; (g) the recipient(s) of the document; (h) where not apparent, the relationship of the author, address(es) and recipient(s) to each; and (i) such other information as is sufficient to identify the document and determine whether the claim of privilege is valid.

D. If any document requested herein was at one time in existence, but has been lost, discarded, or destroyed, identify: (a) each such document, including the (i) date, (ii) nature, (iii) subject matter, (iv) person who originated it and (v) person to whom it was sent; (b) the last known custodian of the document; (c) the date the document was lost, discarded, or destroyed; (d) the reason(s) for discarding or destroying the document; (e) each person having knowledge of the document; and (f) each person having knowledge of the circumstances of it being lost, discarded, or destroyed.

E. All grounds for an objection shall be stated with specificity.

F. Pursuant to Rule 26(e)(1) of the Rules of Federal Procedure, this document request is deemed to be continuing, and the responses thereto are to be supplemented promptly upon acquisition of any additional documentation.

G. "**Remaining Claims**" means (i) the First Amendment retaliation claim and (ii) the First Amendment public meeting claim, which are the only two remaining claims in the above-captioned action following the Court's Memorandum and Order dated September 30, 2016.

H. "**You**" and "**Your**" mean Steven E. Greer.

DOCUMENT REQUESTS

1. Documents reflecting all communications concerning the Remaining Claims, including text messages, as testified to during Your deposition on April 13, 2017, which include any or all of the following individuals:

   a. Linda Soriero

   b. Kirk Swanson

   c. Vince McGowan

   d. Allyson Ford

   e. Nancy Harvey

2. Documents concerning all revenue generated by the Health Care Channel from 2007 to current. This request includes but is not limited to:

   a. Documents reflecting the number of paying subscribers to the Health Care Channel; and

   b. Documents reflecting the cost of membership paid by each subscriber; and

   c. Invoices issued to, or paid by, clients of the Health Care Channel; and

   d. Tax returns filed by the Health Care Channel.

3. Documents concerning all revenue generated by BatteryPark.Tv from 2009 to current. This request includes but is not limited to:

   a. Documents reflecting any solicitation of advertisers for BatteryPark.Tv; and

   b. Documents reflecting any agreement of any individual or entity to advertise on BatteryPark.Tv; and

   c. Documents reflecting any payments made by any individual or entity that advertised on BatteryPark.Tv; including but not limited to:

i. Crunch Gym; and

ii. World Optical; and

iii. Flat Bread Pizza.

4. Documents concerning all compensation that you have earned from New York University or elsewhere for your treatment of patients as a medical doctor.

5. Un-redacted copy of the document bates-stamped GREER000024.

6. All documents you used to calculate the damages set forth in pages 5 and 6 in your Fed. R. Civ. P. 26 (a)(1) Initial Disclosures dated January 30, 2017.

Dated: April 14, 2017
New York, NY

SHER TREMONTE LLP

By: [signature]

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